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11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**  
13 **WESTERN DIVISION**  
14

15 MAVRIX PHOTOGRAPHS LLC, a limited  
16 liability company,

17 Plaintiff,

18 v.

19 SANDRA ROSE LLC, a Georgia Limited  
20 Liability Company; SANDRA ROSE  
21 HENDRICKS, an individual; and DOES 1-  
22 10 INCLUSIVE,

23 Defendants.

Case No. 2:15-cv-596

**COMPLAINT FOR COPYRIGHT  
INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

1 Mavrix Photographs LLC (“Mavrix”), by and through its attorneys of record,  
2 complains against Sandra Rose LLC (“Sandra Rose”), Sandra Rose Hendricks, and DOES  
3 1-10 (collectively “Defendants”) as follows:

4 **JURISDICTION AND VENUE**

5 1. This is a civil action against Defendants for their acts of copyright  
6 infringement in violation of the United States Copyright Act, 17 U.S.C. §§ 101 *et seq.* This  
7 Court has subject matter jurisdiction over the copyright infringement under 28 U.S.C. §  
8 1331, 17 U.S.C. § 501(a), and 28 U.S.C. § 1338(a).

9 2. Venue is proper in this District under 28 U.S.C. §§ 1391(b) and (c) and 28  
10 U.S.C. § 1400(a) in that the claim arises in this Judicial District, the Defendants may be  
11 found and transact business in this Judicial District, and the injury suffered by Plaintiff took  
12 place in this Judicial District. Defendants are subject to the general and specific personal  
13 jurisdiction of this Court because of their contacts with the State of California.

14 **PARTIES**

15 3. Plaintiff Mavrix is a limited liability company existing under the laws of  
16 California, with its principal place of business in Los Angeles, California.

17 4. Plaintiff is informed and believes and, upon such, alleges that Sandra Rose  
18 LLC is a limited liability company, with its principal place of business in Atlanta, Georgia.

19 5. Plaintiff is informed and believes and, upon such, alleges that Sandra Rose  
20 Hendricks is an individual, who resides in Chamblee, Georgia.

21 6. Plaintiff is informed and believes, and upon such, alleges that Defendants are  
22 the alter egos of each other and have a tangled set of relationships. On information and  
23 belief, all Defendants are responsible in part for the copyright infringement that occurred  
24 on the website SandraRose.com. Further, on information and belief, the Defendants have a  
25 unity of interest as Sandra Rose Hendricks is the sole owner of the website. The above  
26 defendants are, on information and belief, engaged in a coordinated scheme to undermine  
27 copyright laws by way of stealing copyrighted images of content owners, such as plaintiff  
28 Mavrix, using those images on their websites and then gaining significant traffic to their

1 website as a result of the high value celebrity images. On information and belief, it would  
2 be inequitable to Plaintiff if these Defendants are not treated as alter egos of each other.

3 7. DOES 1 through 10, inclusive, are unknown to Plaintiff, who therefore sues  
4 said Defendants by such fictitious names. Plaintiff will ask leave of Court to amend this  
5 Complaint and insert the true names and capacities of said Defendants when the same have  
6 been ascertained. Plaintiff is informed and believes and, upon such, alleges that each of the  
7 Defendants designated herein as a “DOE” is legally responsible in some manner for the  
8 events and happenings herein alleged, and that Plaintiff’s damages as alleged herein were  
9 proximately caused by such Defendants.

### 10 **STATEMENT OF FACTS**

#### 11 ***The Photos Forming the Subject Matter of This Dispute***

12 8. Mavrix Photo, Inc. (MPI) is a prominent celebrity photography agency that  
13 licenses its photographs on an exclusive and non-exclusive basis to a multitude of top-tier  
14 media outlets, including, the world’s leading newspapers, television programs and  
15 magazines, like People or US Weekly. MPI has licensed individual images of celebrities  
16 for over \$100,000 to major content outlets.

17 9. MPI made certain photographs of superstar Beyonce Knowles available for  
18 licensing on an individual or blanket basis through MPI since the first publication of the  
19 images. These images are referred to herein as the “Beyonce Photos.” In fact, many of  
20 these photos have been individually licensed as standalone works.

21 10. MPI filed for copyright registration of the Beyonce Photos within 90 days of  
22 their authorship and first publication.

23 11. MPI has assigned to Plaintiff Mavrix all rights (including the copyright) to the  
24 Beyonce Photos.

#### 25 ***The Defendants and the Marketplace***

26 12. On information and belief, Sandra Rose is a sophisticated and successful  
27 publisher serving its readers through a popular celebrity lifestyle and gossip website,  
28 SandraRose.com.

1           13. On information and belief, Defendants goal of reaching the black community  
2 around the United States and beyond is evident in the advertising materials displayed on the  
3 website, which include some that target Southern California specifically.

4           14. Plaintiff alleges, on information and belief, that Defendants owned and  
5 operated SandraRose.com at all times relevant to this dispute.

6           15. Defendants have, on information and belief, violated federal law by willfully  
7 infringing Mavrix copyrights to at least 5 different photographs on SandraRose.com.  
8 Attached hereto as Exhibit A is a true and correct copy of numerous screenshots showing  
9 Defendants' use of the Beyonce Photos on SandraRose.com.

10           16. Specifically, Defendants reproduced, distributed and publicly displayed at  
11 least 5 of the Beyonce Photos, and derivatives thereof, on their website without permission,  
12 consent, or license.

13           17. On information and belief, Defendants' reproduction, distribution and public  
14 display of at least 5 of Plaintiff's photographs, and derivatives thereof, continues unabated  
15 to this very day.

16           18. On information and belief, Defendants herein have driven significant traffic to  
17 SandraRose.com in large part due to the presence of the sought after and searched-for  
18 celebrity images that frame this dispute. All of this traffic translates into substantial ill-  
19 gotten commercial advantage and revenue generation for Defendants as a direct  
20 consequence of their infringing actions.

21  
22                                   **FIRST CLAIM FOR RELIEF**

23                           **(Copyright Infringement, 17 U.S.C. § 501)**

24           19. Plaintiff Mavrix incorporates here by reference the allegations in paragraphs 1  
25 through 18 above.

26           20. Mavrix is the rightsholder to the copyrights of the Beyonce Photos, which  
27 substantially consist of wholly original material that constitutes copyrightable subject  
28 matter under the laws of the United States. MPI and Mavrix have complied in all respects

1 with the Copyright Act and all of the laws of the United States governing copyrights. The  
2 Beyonce Photos have been timely registered with the United States Copyright Office. The  
3 copyright registration numbers for the Beyonce Photos are VA 1-799-844 and VA 1-799-  
4 847.

5 21. All rights, including copyrights, in and to the Beyonce Photos protected under  
6 registration number VA 1-799-844 were assigned to Plaintiff on or around February 25,  
7 2013.

8 22. All rights, including copyrights, in and to the Beyonce Photos protected under  
9 registration number VA 1-799-847 were assigned to Plaintiff on or around November 27,  
10 2013.

11 23. Defendants have directly, vicariously and/or contributorily infringed, and  
12 unless enjoined, will continue to infringe Mavrix's copyrights by reproducing, displaying,  
13 distributing and utilizing the Beyonce Photos for purposes of trade in violation of 17 U.S.C.  
14 § 501 *et seq.*

15 24. Defendants have willfully infringed, and unless enjoined, will continue to  
16 infringe Mavrix's copyrights by knowingly reproducing, displaying, distributing and  
17 utilizing the Beyonce Photos for purposes of trade.

18 25. On information and belief, Defendants' acts of infringement are willful  
19 because, inter alia, the Defendants are sophisticated online publishers with full knowledge  
20 of the strictures of federal copyright law and the basic requirements for licensing the use of  
21 copyrighted content for commercial exploitation.

22 26. On information and belief, Defendants, despite such knowledge, willfully  
23 reproduced, publicly distributed and publicly displayed the Beyonce Photos on  
24 SandraRose.com.

25 27. Defendants have received substantial benefits in connection with the  
26 unauthorized reproduction, display, distribution and utilization of the Beyonce Photos for  
27 purposes of trade, including by increasing the traffic to Defendants' website and, thus,  
28 increasing the advertising fees realized.

1           28. The actions of Defendants were and are continuing to be performed without  
2 the permission, license or consent of Mavrix.

3           29. The wrongful acts of Defendants have caused, and are causing, great injury to  
4 Plaintiff, of which damages cannot be accurately computed, and unless this Court restrains  
5 Defendants from further commission of said acts, Mavrix will suffer irreparable injury, for  
6 all of which it is without an adequate remedy at law. Accordingly, Plaintiff seeks a  
7 declaration that Defendants are infringing Mavrix's copyrights and an order under 17  
8 U.S.C. § 502 enjoining Defendants from any further infringement of Plaintiff's copyrights.

9           30. As a result of the acts of Defendants alleged herein, Mavrix has suffered and is  
10 suffering substantial damage to its business in the form of diversion of trade, loss of profits,  
11 injury to goodwill and reputation, and the dilution of the value of its rights, all of which are  
12 not yet fully ascertainable.

13           31. Because of the willful nature of the copyright infringement, Plaintiff is entitled  
14 to an award of statutory damages of up to \$150,000 per work infringed.

15           32. Plaintiff has identified at least 5 works infringed by Defendants, which  
16 occurred by way of reproduction, public distribution and public display of the Beyonce  
17 Photos on SandraRose.com. Therefore, Mavrix is entitled to an award of \$750,000 in  
18 statutory damages.

19           33. Alternatively, at its discretion, Mavrix is entitled to actual damages in an  
20 amount to be proven at trial for the infringement of all works at issue.

21           34. Plaintiff is also entitled to its attorney's fees in prosecuting this action.  
22

23                                   **PRAYER FOR RELIEF**

24           WHEREFORE, Plaintiff requests judgment against Defendants as follows:

25           1. The Defendants, their officers, agents, servants, employees,  
26 representatives, and attorneys, and all person in active concert or participation with them,  
27 be permanently enjoined from designing, copying, reproducing, displaying, promoting,  
28 advertising, distributing, or selling, or any other form of dealing or transaction in, any and

1 all advertising and promotional materials, print media, signs, Internet websites, or any other  
2 media, either now known or hereafter devised, bearing any design or mark which infringe,  
3 contributorily infringe, or vicariously infringe upon Plaintiff Mavrix's rights in the  
4 photographs at issue.

5           2. Defendants be held liable to Plaintiff in statutory damages for copyright  
6 infringement, including willful infringement, in accordance with 17 U.S.C. §§ 504(a)(2) &  
7 (c) and for costs, interest and reasonable attorney's fees pursuant to 17 U.S.C. § 505.

8           3. An accounting be made for all profits, income, receipts or other benefit  
9 derived by Defendants from the reproduction, copying, display, promotion, distribution or  
10 sale of products and services, or other media, either now known or hereafter devised, that  
11 improperly or unlawfully infringes upon Plaintiff's copyrights pursuant to 17 U.S.C. §§  
12 504 (a)(1) & (b).

13           4. Requiring Defendants to account for and pay over to Plaintiff all profits  
14 derived by Defendants from their acts of copyright infringement and to reimburse Plaintiff  
15 for all damages suffered by Plaintiff by reasons of Defendant's acts, pursuant to 17 U.S.C.  
16 §§ 504 (a)(1) & (b).

17           5. Actual damages for copyright infringement pursuant to 17 U.S.C. §§  
18 504 (a)(1) & (b).

19           6. That Plaintiff be awarded any such other and further relief as the Court  
20 may deem just and appropriate.

21  
22 Dated: January 27, 2014

**ONE LLP**

23  
24 By: /s/ Joanna Ardalan  
25 Peter R. Afrasiabi, Esq.  
26 John Tehranian, Esq.  
27 Joanna Ardalan, Esq.  
28 Attorneys for Plaintiff,  
Mavrix Photographs LLC

**DEMAND FOR JURY TRIAL**

Plaintiff Mavrix Photographs LLC hereby demands trial by jury of all issues so triable under the law.

Dated: January 27, 2015

**ONE LLP**

By: /s/ Joanna Ardalan  
Peter R. Afrasiabi, Esq.  
John Tehranian, Esq.  
Joanna Ardalan, Esq.  
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Mavrix Photographs LLC